

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

WAYNE VAN SCOY,)	
)	
Plaintiff and)	
Counterclaim-Defendant,)	
)	
v.)	
)	
VAN SCOY DIAMOND MINE OF)	Case No. 05-108 (KAJ)
DELAWARE, INC., a Delaware corporation,)	
KURT VAN SCOY, and DONNA VAN SCOY,)	
)	
Defendants and)	
Counterclaim-Plaintiffs.)	

**STATEMENT BY DEFENDANTS
COUNSEL UNDER LOCAL RULE 7.1.1 RESPECTING
DEFENDANTS' MOTION FOR LEAVE TO FILE AN
AMENDED ANSWER, AFFIRMATIVE DEFENSES AND COUNTERCLAIMS**

I, Charles N. Quinn, hereby state that I am a partner in the firm of Fox Rothschild LLP, counsel for the defendants in this action, that I am admitted in good standing as a member of the Bar of the Supreme Court of Pennsylvania and the United States District Court for the Eastern District of Pennsylvania, that I have been admitted pro hac vice to represent the defendants in this action, and that I have made reasonable efforts to reach agreement with counsel for the plaintiff respecting the matters set forth in the instant motion.

FOX ROTHSCHILD LLP

/s/ Charles N. Quinn
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*Attorneys for Defendants and
Counterclaim Plaintiff*

Dated: January 23, 2006